



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2540
Fax 202 336-7922
tamara.preiss@verizon.com

October 5, 2010

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: High-Cost Universal Service Support, WC Docket No. 05-337; A National Broadband Plan for Our Future, GN Docket No. 09-51

Dear Ms. Dortch:

Yesterday, Chris Miller, Maggie McCready, and the undersigned met separately with Charles Mathias, Senior Legal Advisor for Wireless, International, and Public Safety Issues to Commissioner Baker, and with Jane Jackson, Margaret Wiener, Martha Stancill, and Scott Mackoul, of the Wireless Telecommunications Bureau, and Rebekah Goodheart, Elise Kohn, Katie King, and Ken Burnley (by telephone), of the Wireline Competition Bureau.

The purpose of the meeting was to discuss the anticipated Notice of Proposed Rulemaking regarding universal service mobility funding, described in the National Broadband Plan, to improve wireless coverage and speeds in those areas that lack 3G service today. We expressed overall support for the universal service reforms proposed in the Plan. With respect to mobility funding in particular, we indicated that targeted, one-time infrastructure funding could help promote the Commission's broadband objectives in certain areas. We indicated that the Commission should allow carriers that participate in the program to use mobility funding to deploy either 3G or 4G services because there are areas that do not have 3G coverage today that will likely move directly to 4G. We addressed Verizon Wireless's rural LTE partnership program and said that, depending on how the anticipated mobility program is structured, those carriers that lease Verizon spectrum to offer 4G services in rural areas may be candidates to put this support to good use.

In addition, we discussed the need for clearly defined obligations and performance metrics so that carriers can make informed decisions about program participation, as well as the need to structure the geographic scope of supported areas to account for CMRS license areas and network deployment. Finally, we addressed the funding distribution mechanism and again expressed support for competitive bidding. We indicated that a competitive bidding approach will maximize the potential to gain useful knowledge about the cost of wireless broadband deployment and how to tailor support conditions.

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This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Green". The signature is fluid and cursive, with the first name "Jonathan" and last name "Green" clearly distinguishable.

cc: (via e-mail)
Charles Mathias
Jane Jackson
Margaret Wiener
Martha Stancill
Scott Mackoul
Rebekah Goodheart
Elise Kohn
Katie King
Ken Burnley